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**February 22, 2021**

**Via ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: United States v. Stephen M. Calk, 19 Cr. 366 (LGS)

Dear Judge Schofield:

We represent the defendant, Stephen M. Calk, in the above-captioned action. We have received a copy of the Motion to Quash and/or Modify a Grand Jury Subpoena submitted to Your Honor's chambers this morning on behalf of Lieutenant General Randall Rigby.

On their face, the facts recited in the motion strongly indicate that the government is abusing the grand jury process in an indicted case in order to compel an interview with a potential trial witness. The defense respectfully requests that the Court set a briefing schedule on the motion that permits the defense an opportunity to be heard on this issue.

Respectfully submitted,

/s/ Paul H. Schoeman

Paul H. Schoeman  
Darren A. LaVerne

cc: All counsel (via ECF)